

m \$

RECEIVED

AUG 24 2012

TONY R. MOORE, CLERK
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT, LOUISIANA

BY: 

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

DIVISION

HENRY L. NELSON (Plaintiff)

CIVIL ACTION NO. 5:12-CV-2276

VERSUS

JUDGE _____

LOUISIANA ATTORNEY DISCIPLINARY BOARD
AND THE OFFICE OF THE DISCIPLINARY COUNSEL
(Defendants)

MAGISTRATE JUDGE _____

COMPLAINT

I.

The plaintiff in this case is Henry L. Nelson, who is a citizen of Louisiana, and whose mailing address is Post Office Box 19631, Shreveport, Louisiana 71149.

2.

The defendant in this case is The Louisiana Attorney Disciplinary Board and The Office of the Disciplinary Counsel whose mailing address is 4000 S. Sherwood Forest Blvd, Suite 607, Baton Rouge, Louisiana 70816.

3.

This court has jurisdiction over this civil action because the plaintiff's claims arise under federal law, the Freedom of Information Act.

4.

On or about early February 2008, I submitted a complaint with the Louisiana Attorney Disciplinary Board against Donald Wilson (ODC #0023584) and David Touchstone (ODC #0023583), attorneys at law for unethical conduct.

5.

The complaint was assigned to the Deputy Counsel Gregg Tweed of the Office of the Disciplinary Counsel (ODC) and investigation was subsequently done according to correspondence I received dated June 2, 2008 signed by Deputy Tweed. The letter from Mr. Tweed informed me I had 30 days to file a written appeal or to dismiss.

6.

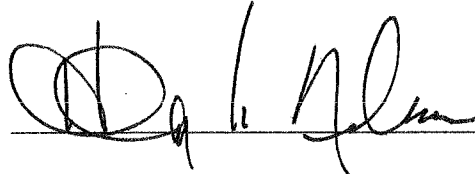
After receipt of the determination by the Office of the Disciplinary Counsel, I made written request for a written copy of the lawyers' response as is allowable according to the Review and Investigation procedure of the ODC as is included in the Upholding Standards of Professional Conduct brochure.

7.

I never received a copy of the lawyers' response, and by not receiving the copy of the response I had no idea what allegations or response I needed to address in my written appeal. Thus, non-receipt of the communication request hindered my due process as is set forth under Supreme Court Rule XIX in this complex matter as there had been no exchange of correspondence nor had there been any interview of the parties or other witnesses directly to obtain further supporting documents to my knowledge.

8.

As the plaintiff, I respectfully request that this court order The Louisiana Disciplinary Board and the Office of the Disciplinary Counsel release to me copies of the Defendants' responses received in the Review and Investigation of the matter of ODC Files 0023584 & 0023583.

A handwritten signature in black ink, appearing to read 'H. Nelson', is written over a horizontal line.

HENRY L. NELSON, PLAINTIFF

Post Office Box 19361

Shreveport, Louisiana 71149

Phone: 318-470-4839